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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

*R.L. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05515;*

*P.T. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05677; and*

*S.W. vs. Uber Technologies, Inc., et al.,  
3:25-cv-06329*

**MOTION TO WITHDRAW AS COUNSEL  
OF RECORD FOR PLAINTIFFS P.T. AND  
S.W. ONLY**

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record for Plaintiffs P.T. and S.W. Counsel does not seek withdrawal from Plaintiff R.L. as explained below.

Prior to Defendants filing their third show cause motion [ECF 4137], Counsel met and conferred with opposing counsel on October 7, 2025 to discuss the three additional “non-bona-fide receipts” that the above-referenced Plaintiffs previously provided to Counsel. After reviewing the ride receipts with opposing counsel, Counsel advised his firm’s intention to withdraw as counsel of record should the above-referenced Plaintiffs fail to provide additional

1 ride receipt proof. Relying on opposing counsel's representations asserted during the meet and  
2 confer, Counsel contacted the above-referenced Plaintiffs via email the same day. Counsel  
3 informed Plaintiffs of Defendants' concerns and requested that Plaintiffs provide any additional  
4 proof of their ride at issue, *e.g.*, the summary email that Uber typically sends upon ride  
5 completion. Counsel further attempted contacting the above-referenced Plaintiffs via telephone  
6 on October 8 and 14, 2025. Upon Defendants filing their third show case motion [ECF 4137],  
7 Counsel sent follow-up emails to the above-referenced Plaintiffs on October 14, 2025 as well as  
8 mailed correspondence via 2-day Federal Express giving Plaintiffs until October 22, 2025 to  
9 provide any additional proof otherwise Counsel would initiate the process of withdrawing as  
10 their attorneys. As required by Local Rule 11-5(a), Counsel has provided written notice of  
11 Counsel's intent to withdraw, reasonably in advance, to the above-referenced Plaintiffs as well  
12 as notice to opposing parties.  
13

14  
15 At the time of filing this motion to withdraw, no additional ride receipt proof has been  
16 provided by Plaintiffs P.T. or S.W. nor substitute counsel identified. However, on October 23,  
17 2025, Plaintiff R.L. contacted Counsel and provided the ride summary emailed directly from  
18 Uber. Counsel immediately uploaded said receipt to MDL Centrality and emailed opposing  
19 counsel a courtesy copy of the additional ride proof. Counsel intends to proceed with R.L.'s  
20 action against Defendants and does not intend to withdraw as counsel of record at this time.  
21

22 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully  
23 request that they be allowed to withdraw as counsel of record for Plaintiffs P.T. and S.W. A  
24 courtesy copy of this motion will be served upon Plaintiffs P.T. and S.W. at their last known  
25 address and via electronic mail.  
26  
27  
28

1 Dated: October 24, 2025

Respectfully submitted,

2  
3 **PULASKI KHERKHER, PLLC**

4 /s/ D. Douglas Grubbs

5 D. Douglas Grubbs (*Admitted Pro Hac Vice*)

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10 Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs